

Rec 4-5-11



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David E. Hall  
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Joseph Valente  
Member, Marquette

James M. Iwanicki, P.E.  
Engineer-Manager

April 1, 2011

Steve Casey, P.E., Supervisor  
Water Resources Division  
Department of Environmental Quality  
420 Fifth Street  
Gwinn, MI 49841

Re: Request for Review of Draft "Project Purpose" For Proposed Marquette County Road 595

Dear Mr. Casey:

In our December 15, 2010 pre-application meeting, and in your subsequent meeting with Jeff King of King & MacGregor Environmental, Inc. on February 15, 2011, you recommended that the Marquette County Road Commission (MCRC) submit for review a draft "Project Purpose" for the proposed County Road 595 (CR 595). We concur with your position that the "Project Purpose" is the key factor to the review of alternatives and the assessment of any proposed project. Agreement with the draft "Project Purpose" between the Department of Environmental Quality (DEQ), the Environmental Protection Agency (EPA), and MCRC prior to submittal of a permit application is a very sensible approach.

The MCRC is proposing a new county road to serve an area of Marquette County that is currently underserved by existing transportation infrastructure. Even if the existing roads are upgraded, they will not meet the overall purpose and intent for CR 595. The MCRC believes that the County as a whole will benefit from the construction of the proposed project, which will provide the following benefits:

- The west end of Marquette County would have improved access and a direct route to the northwest portion of the county for public safety, industry, recreation, and emergency services.
- Eastern and central Marquette County would experience a significant reduction of industrial truck traffic on CR 550, US-41, and through the cities of Marquette, Negaunee and Ishpeming.
- There is an important need for a primary county road to be located west of the Silver Lake Basin in order to provide an alternate transportation route across the Dead River to the northwest portion of Marquette County in the event of another catastrophic flood event such as occurred in 2003 after the failure of the Silver Lake Basin berm. This event created access issues to the northern portions of the county.

In the Woodland Road application for permit submitted in August 2009, alternatives were evaluated for various routes to access what is generally termed "the Yellow Dog Plains". After the withdrawal of the application by Woodland Road LLC, local governmental units, individual citizens, and commercial businesses began to mobilize to express strong concern that existing roads would not serve the public and private needs of the county and that there was a great public need for a new

county road in northwest Marquette County. As a result, the Marquette County Board of Commissioners requested that the MCRC initiate the process to establish a new primary county road to serve that area of Marquette County.

MCRC held a public hearing on October 7, 2010 and at its regular monthly meeting on October 18, 2010 passed a resolution to initiate the process "to develop the written partnerships needed to design, build, and maintain" a new primary county road to be known as CR 595 (resolution attached).

MCRC determined that the need for a new primary county road lies within a corridor that is two miles on either side of the County Road FY/US-41 intersection on the south, which is the south end point of the proposed CR 595, and extending north to Triple A Road (map attached). This road corridor is located generally in the area that would provide the normal 8-mile wide east-west spacing for primary county roads.

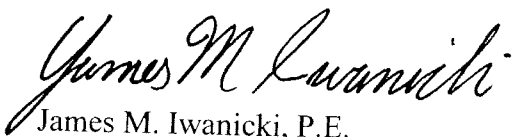
As a result of the background information provided above, MCRC proposes the following to be the "Project Purpose" for the proposed CR 595:

***Construct a primary county north-south road that will provide improved public safety, access and a more direct route to the northwestern portion of Marquette County, west of the Dead River dam system, connecting a somewhat isolated but key industrial, commercial and recreational area to US-41 and reducing truck travel through the County's population centers.***

MCRC appreciates the opportunity to receive comments from DEQ and EPA in order to develop a "Project Purpose" that is acceptable to MCRC, DEQ and EPA prior to a formal submittal of the application for permit. We are attempting to move this process forward for a late spring or early summer filing of a permit application. We sincerely appreciate your review of this draft "Project Purpose".

Thank you for your continued cooperation and coordination of this review. We look forward to your response and meeting with you to discuss this at your earliest convenience. If you have any additional questions, please do not hesitate to contact me.

Sincerely,



James M. Iwanicki, P.E.  
Engineer-Manager, Marquette County Road Commission

Attachments (MCRC Resolution, Corridor Map)

CC: Ginny Pennala, MDEQ  
Sue Elston, Environmental Protection Agency  
Melanie Haveman, Environmental Protection Agency



# Board of County Road Commissioners

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October 18, 2010

Whereas, it is the responsibility of the Marquette County Road Commission to provide a safe and efficient county road system,

Whereas, a public need for a new road has been identified and established by the Marquette County Road Commission, the County Board of Marquette, and all four affected townships (Champion, Ely, Humboldt, and Michigamme),

Whereas, a public need for a new road has been identified by other local government agencies such as the City of Marquette, Powell Township, and Marquette Township that are indirectly affected,

Whereas, developing a new all-season primary county road to run north-south beginning at the intersection of US-41/CR FY northerly to CR IAA is in the public's best interest,

Whereas, the need for the new county road lies within a corridor within 2 miles on either side of the following area: Humboldt Township: T47N-R29W Section 2; Champion Township: T48N-R29W Sections 35, 26, 23, 14, 11, and 2, T49N-R29W Sections 35, 26, 23, 14, 11, and 2; Michigamme Township: T50N-R29W Sections 35, 26, 23, 14, and 11(See Attached Map),

Whereas, the purpose of the new all-season county primary road is to provide enhanced year-round vehicle access to the adjoining lands in the north central portion of Marquette County,

Whereas, this new road will provide additional recreational opportunities to the public as well as provide a direct benefit to the timber, mining, and gravel industries,

Whereas, highway public safety, emergency response, and emergency services will be significantly enhanced,

Whereas, a new road in this area will affect traffic volumes and patterns, especially heavy truck traffic, along US-41/M-28, CR 510, CR 550, the roads and streets in the City of Marquette, CR 492 (Wright Street), CR 502, and CR 573,

Whereas, a new road will affect noise quality, air quality, and water quality along the proposed route and also on existing routes,

Whereas, a new road in this corridor will impact the environment including but not limited to streams, wetlands and wildlife,

Whereas, a new road might impact historical sites,

Whereas, a new road will take considerable resources to design, construct, and maintain,

Whereas, private firms and other governmental entities might be able to mitigate the cost of developing a new road,

